HONDA

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September 5, 2024

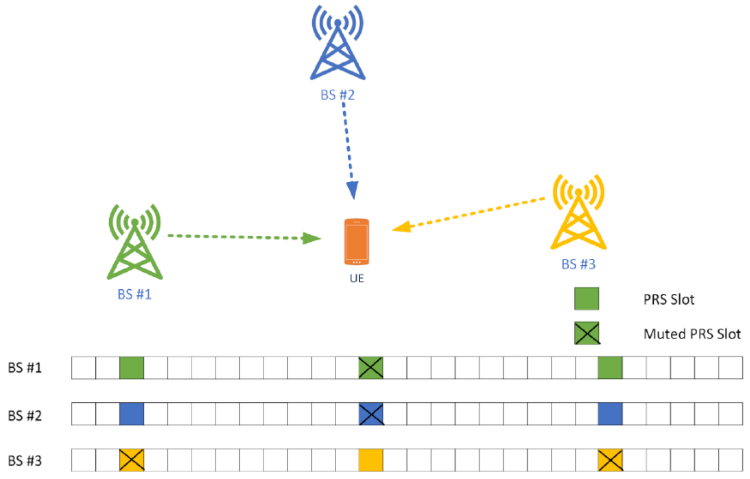
Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
45 L Street NE
Washington, DC 20054

Re: WT Docket No. 24-240

Dear Ms. Dortch,

American Honda Motor Co., Inc. appreciates the opportunity to comment regarding the NextNav petition for reconfiguration of the 902-928 MHz band (Lower 900 MHz Band). We write you today on behalf of our Acura customers who may be affected by the FCC decision in this case. As you are aware via certification filed by Continental Corporation, from 2014 our Acura line of vehicles uses a keyless entry system which operates in the 922-926 MHz portion of the band. We recognize that as a Part 15 device operator, we cannot claim interference rights, but nevertheless do want to take the opportunity to respond to the petition.

As it is currently written, we understand that the NextNav system is to operate at a 10% duty cycle, transmitting only 100 milliseconds out of each 1000 milliseconds. This was depicted in the appendix of NextNav's petition.



As long as the proposed system operates as shown, there is a low probability of noticeable interaction with our existing keyless access system. This is due to the RF protocol which already has a transmit-receive handshake, with multiple retries built in. In the event the NextNav system were to operate in more than (1) 100 millisecond block out of each 1000 milliseconds, the probability of interaction increases dramatically. In this case, we would be in a situation where people may not be able to unlock and operate their vehicle normally.

Additionally, we are noting NextNav's petition includes a request which modifies 90.353(d) to remove the requirement that licensed operators of the spectrum not cause unacceptable levels of interference to part 15 devices. It is not clear at this point what the technical implication of this change would be. Referring to the above explanation, we do not anticipate a noticeable impact as long as the NextNav system limits operation to 10% duty cycle, transmitting only 100 milliseconds out of each 1000 milliseconds. However, it is difficult to anticipate the effect of removing such a requirement. This remains a concern that we will continue to monitor.

To date, we have sold approximately a half-million Acura vehicles equipped with this keyless system. We are utilizing the Lower 900 MHz Band due to allowance of Direct Sequence Spread Spectrum and higher power output capabilities to provide the automotive industry's longest range keyless system. We do not believe we could maintain a similar level of RF range performance for our customers if there was a requirement to change to a different band. To shift frequencies would impact the entire system which includes keys, transceiver and roof antenna. There are also significant factors for development, manufacturing and logistics, not to mention the inconvenience to a multitude of our customers, some of whom have specifically purchased this as a stand-alone option and utilize it daily.

In conclusion, replacement of an automotive keyless FOB system of this magnitude would be a prohibitive undertaking. We ask that the FCC ensure the rulemaking provides functional coexistence and inter-operability of these systems.

Thank you again for providing the opportunity to offer feedback on behalf of our many customers. We appreciate your consideration of our views.

If you have any questions regarding this matter, please feel free to contact me at (202) 553-0835

Sincerely,

Jim Kliesch
Director, Regulatory Affairs
Product Regulatory Office
American Honda Motor Co., Inc.